

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES )  
OF CLIFF MANOR, INC., a Delaware corporation, )  
INTEGRATED HEALTH SERVICES AT )  
RIVERBEND, INC., a Delaware Corporation, )  
INTEGRATED HEALTH SERVICES AT )  
SOMERSET VALLEY, INC., A Delaware )  
corporation, ALPINE MANOR, INC., a )  
Pennsylvania corporation, INTEGRATED )  
HEALTH GROUP, INC., a Pennsylvania )  
corporation, SPRING CREEK OF IHS, INC., a )  
Pennsylvania corporation, FIRELANDS OF IHS, )  
INC., a Pennsylvania corporation, ELM CREEK )  
OF IHS, INC., a Pennsylvania corporation, IHS )  
LONG TERM CARE SERVICES, INC., a )  
Delaware corporation, )

Plaintiffs,

**V.**

THCI COMPANY LLC,

Defendant,

ABE BRIARWOOD CORPORATION and  
JOHN DOES 1-10,

### Additional Counterclaim Defendants.

**CONSENT ORDER**

Upon the subjoined consent of the parties,

IT IS this                    day of August, 2006,

ORDERED, that effective at the end of the day on August 31, 2006, except as the parties may otherwise agree in writing, the respective plaintiffs shall be deemed to have

vacated, and defendant shall be deemed to have accepted possession of, the nine nursing home facilities covered by this proceeding; and from and after that date defendant shall be responsible for patient care and for the expenses of the nine facilities; and it is further

ORDERED, that plaintiffs are not obligated to turn over any of the cash or receivables associated with the facilities; and should defendant or its designees collect any such receivables, such monies shall be held in trust for the benefit of the respective plaintiffs, and the recipient shall transmit such funds to the appropriate plaintiff promptly on receipt.

---

The Honorable Gregory M. Sleet  
United States District Judge

CONSENTED TO:

\_\_\_\_\_, August \_\_\_\_, 2006

Michael Lastowski (DE 3892)  
Richard William Riley (DE 4052)  
DUANE MORRIS LLP  
1100 North Market Street, Suite 1200  
Wilmington, DE 19801

Daniel J. DeFranceschi (DE 2732)  
Jason M. Madron (DE 4431)  
RICHARDS, LAYTON & FINGER, P.A.  
One Rodney Square  
920 North King Street  
Wilmington, DE 19801

Amos Alter, Esq.  
Aurora Cassirer, Esq.  
TROUTMAN SANDERS LLP  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10174

*Attorneys for Plaintiff and Additional Counterclaim  
Defendant Abe Briarwood Corporation*

\_\_\_\_\_, August \_\_\_\_, 2006

Collins J. Seitz, Jr. (DE 2237)  
Kevin F. Brady (DE 2248)  
CONNOLLY BOVE LODGE & HUTZ LLP  
1007 North Orange Street  
P.O. Box 2207  
Wilmington, DE 19801

David S. Sage, Esq.  
Paul R. Marino, Esq.  
PITNEY HARDIN LLP  
P.O. Box 1945  
Morristown, NJ 07962

*Attorneys for Defendant*